

MAR 11 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA

v.

(4) MAOXUAN XIA,
a/k/a "Xin Lin," a/k/a "Xiang Lin,"
a/k/a "Zhiyue Qin,"

Defendant.

Case Number: 3:24-CR-64-FDW

JOINT STATEMENT OF STIPULATED FACTS

This statement of facts does not purport to include all the Defendant's illegal conduct during the course of his charged offense and is not intended to represent all the Defendant's relevant conduct for sentencing purposes. Nor does it purport to be an inclusive recitation of all that the Defendant heard, knew, or witnessed concerning the illegal activities of himself or those of his coconspirators. It represents sufficient information for the Court to find a factual basis for accepting the Defendant's guilty plea in the above-captioned matter. Had the Defendant proceeded to trial, the Defendant agrees that the Government's evidence would establish the following beyond a reasonable doubt:

1. Beginning in at least May 2022 and continuing until on or about April 15, 2024, within the Western District of North Carolina and elsewhere, the Defendant, in violation of 18 U.S.C. § 1956(h), knowingly, intentionally, and willfully conspired with others to: (1) conduct and attempt to conduct financial transactions affecting interstate commerce involving the proceeds of narcotics trafficking, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source,

ownership, and control of the proceeds and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and (2) engage and attempt to engage in monetary transactions in criminally derived property that involved proceeds of narcotics trafficking and were of a value greater than \$10,000, in violation of 18 U.S.C. § 1957(a).

2. During the course of and in furtherance of the conspiracy, the Defendant admits he served as a courier for a Chinese money laundering organization (the “Organization”) that received bulk cash proceeds from unlawful activity, including narcotics trafficking, and deposited those illicit funds, which generally exceeded \$10,000 for any given transaction, into shell company bank accounts controlled by the Organization in order to conceal and disguise the nature, location, source, ownership, and control of the illicit funds. In his role as courier, the Defendant received instructions from another member of the Organization directing him to pick up bulk cash from the Organization’s customers, including U.S.-based drug traffickers, and then to deposit the bulk cash into business checking accounts opened at major financial institutions in the names of shell companies that were controlled by the Organization. The Defendant often used fake driver’s licenses bearing the names “Xin Lin,” “Xiang Lin,” and “Zhiyue Qin” to deposit the bulk cash. After the illicit funds were deposited, other members of the Organization would transfer the money to other bank accounts, cryptocurrency accounts, and escrow accounts.

3. The Defendant admits that he picked up and deposited—using both his real and fake identities—more than \$30 million in illicit funds, including drug trafficking proceeds. The Defendant admits that during an extended period of time, he regularly

engaged in laundering funds from multiple sources and received substantial payments in return for his courier services. The Defendant was an average participant in this criminal activity.

4. The Defendant admits that the total amount of illicit funds laundered in the conspiracy for which he had actual knowledge and involvement was more than \$30,000,000.

5. The Defendant admits that he knew that funds laundered in the conspiracy included the proceeds of, or were intended to promote, an offense involving, the manufacture, importation, or distribution of a controlled substance.

6. The Defendant further admits that on or about July 27, 2022, within the Western District of North Carolina, he (1) knowingly conducted financial transactions affecting interstate commerce involving the proceeds of narcotics trafficking, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and (2) knowingly engaged and caused another to engage in monetary transactions in criminally derived property that involved proceeds of narcotics trafficking and were of a value greater than \$10,000, in violation of 18 U.S.C. § 1957(a).

7. The Defendant admits that on or about July 27, 2022, at the direction of another member of the Organization, the Defendant picked up \$313,120 of bulk cash proceeds from narcotics trafficking and then took the illicit funds to the Bank of America branch

located at 9505 Pineville-Matthews Road, Pineville, North Carolina. The Defendant deposited the \$313,120 in two separate transactions into one business checking account ending in 8706 registered in the name of Kowloon Holding, Inc. ("Kowloon"), one of the shell companies owned and controlled by the Organization. The Defendant deposited the bulk cash using a fake New York driver's license bearing the name "Xin Lin."

8. The Defendant admits that he knew the \$313,120 deposited into Kowloon's bank account on or about July 27, 2022, represented the proceeds of some form of unlawful activity.

9. The Defendant agrees venue and jurisdiction lie with this Court pursuant to 18 U.S.C. § 3237.

10. The Defendant also agrees that his participation in the above-described acts was in all respects knowing, intentional, and willful, reflecting an intention and deliberation to do something the law forbids, and was not in any way the product of any accident, mistake of law or fact, duress, entrapment, or public authority.

11. With his signature below and that of his counsel, the Defendant agrees that he has fully adopted this statement of facts as his own statement. The Defendant is adopting this statement of facts because it is a true and correct summary of the Defendant's own conduct.

12. The Defendant is pleading guilty because the Defendant is in fact guilty.

Respectfully submitted,

MARLON COBAR

Chief
Narcotic and Dangerous Drug Section
Criminal Division
U.S. Department of Justice

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by MINGDA HANG
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By: _____

Mingda Hang
Acting Assistant Deputy Chief of Litigation
Jayce Born
Trial Attorney

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Melanie L. Alsworth
Acting Deputy Chief of Litigation

Date: _____

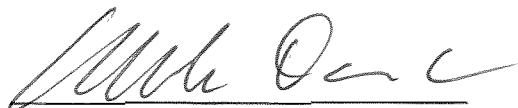
Approved by:

Date: _____

LAWRENCE J. CAMERON
Acting United States Attorney
Western District of North Carolina

Date: 3/11/2025

By:



Alfredo De La Rosa
Assistant United States Attorney
Western District of North Carolina

Approved by:

Date: 3/11/2025

By:



Erik Lindahl
Assistant United States Attorney
Western District of North Carolina

DEFENDANT'S ACKNOWLEDGMENT

I have reviewed this Statement of Facts with the assistance of an English-Chinese interpreter, and have discussed it at length with my attorney, Stacey Van Malden, Esq. This Statement of Facts has been translated into Chinese for me. I understand that the English version controls. I fully understand these facts and agree to them without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me, nor am I under the influence of anything that could impede my ability to understand this Statement of Facts fully.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in the accompanying Plea Agreement. I am satisfied with the legal services provided by my attorney in connection with this Statement of Facts, the accompanying Plea Agreement, and all matters related to it.

Maoxuan Xia

Maoxuan Xia
Defendant

03/06/2025

Date

ATTORNEY'S ACKNOWLEDGMENT

I am the Defendant's attorney. I have fully explained to the Defendant, through an English-Chinese interpreter, the Defendant's rights and the applicable provisions of the Sentencing Guidelines. I have carefully reviewed every part of this Statement of Facts with the Defendant through an English-Chinese interpreter. The Defendant is agreeing to this Statement of Facts voluntarily, intelligently, and with full knowledge of all consequences of the Defendant's plea of guilty.

Stacey Van Malden

Stacey Van Malden, ESQ.
Attorney for Defendant

3/10/25

Date